

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
SOFIA TROUBETSKAIA	:	VIOLATIONS: 18 U.S.C. § 1341 (mail fraud - 12 counts)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNTS ONE THROUGH SIX

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Defendant SOFIA TROUBETSKAIA lived in Canada.
2. eBay was an Internet-based company which operated a commercial interactive online auction service. eBay acted as a broker between sellers of items and potential buyers. When a seller and a buyer were put in contact with each other through eBay's auction service, the finalization of the transaction, including payment for and delivery of the item, was left to be arranged by the buyer and the seller.
3. Defendant SOFIA TROUBETSKAIA, and others known and unknown to the grand jury, offered and caused to be offered merchandise for sale on eBay internet auctions. The merchandise was offered using the name of actual eBay account holders who were unaware that defendant TROUBETSKAIA and others were using their account. The items which defendant TROUBETSKAIA and others posted for sale on eBay auctions using eBay account

holders' identifiers included, among others, laptop computers, Rolex watches, a cell phone, a camera, a hard drive, and an engine.

4. Defendant SOFIA TROUBETSKAIA, and others known and unknown to the grand jury, accepted winning bids from the eBay users (the buyers) for items which defendant TROUBETSKAIA and others had posted for auction on eBay. Defendant TROUBETSKAIA and others instructed the winners to pay them for the items by sending a check or money order for a specified amount to SOFIA TROUBETSKAIA, 93 Old York Rd., Suite 1-725, Jenkintown, PA 19046.

5. At least twelve buyers sent payment for the requested amounts to defendant SOFIA TROUBETSKAIA at the address in Jenkintown, PA, as directed by defendant TROUBETSKAIA and others known and unknown to the grand jury, but received no merchandise in return. At least six of these buyers sent their payment by United States Mail, and at least six of these buyers sent their payment by Federal Express, DHL, or UPS commercial interstate carriers.

THE SCHEME

6. From in or about April 2004 to in or about June 2004, defendant **SOFIA TROUBETSKAIA,** and others known and unknown to the grand jury, devised and intended to devise a scheme to defraud, and to obtain money by means of false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

It was part of the scheme that:

7. Defendant SOFIA TROUBETSKAIA, and others known and unknown to

the grand jury, obtained and attempted to obtain money totaling approximately \$21,990.40 in the form of payments from twelve individuals by falsely representing that they would provide each item offered if the victim won the bidding in the internet auction and paid the auctioned price, and sometimes also an additional charge for shipping.

8. Defendant SOFIA TROUBETSKAIA obtained assistance from Y.G. a person known to the grand jury, in opening a bank account at Wachovia Bank, 50 Huntingdon Pike, Rockledge, PA 19046 and a commercial mailbox at the UPS Store, 93 Old York Rd, Suite 1-725, Jenkintown, PA.

9. On or about April 23, 2004, defendant SOFIA TROUBETSKAIA opened a bank account at Wachovia Bank, 50 Huntingdon Pike, Pockledge, PA 19046 using her passport and a Canadian identification card. Wachovia Bank gave this account the account number ending in numbers 2240.

10. On or about April 23, 2004, defendant SOFIA TROUBETSKAIA opened a mailbox at the UPS Store on 93 Old York Rd, Suite 1-725, Jenkintown, PA. The application lists SOFIA TROUBETSKAIA'S address as 43 Boul Samson , Apt. 208, Laval, OC H7X3R9, and lists a second name of I.B. on the account.

11. Defendant SOFIA TROUBETSKAIA, and others known and unknown to the grand jury, used a computer connected to the internet to offer merchandise for sale through the eBay auction site.

12. Defendant SOFIA TROUBETSKAIA, and others known and unknown to the grand jury, used the identifying information of existing eBay account holders, without the knowledge or consent of those account holders, when participating as sellers on the auction site.

13. Defendant SOFIA TROUBETSKAIA, and others known and unknown to

the grand jury, participated as a seller of merchandise in auctions conducted through the eBay internet site, offering a piece of merchandise, until the auction closed and a winner was declared.

14. Defendant SOFIA TROUBETSKAIA, and others known and unknown to the grand jury, contacted the winner by e-mail, advised them that they had won, and directed them to send payments by check or money order to SOFIA TROUBETSKAIA, 93 Old York Rd., Suite 1-275, Jenkintown, PA 19046.

15. Defendant SOFIA TROUBETSKAIA, and others known and unknown to the grand jury, represented that the item auctioned and bid upon by the victims would be provided after their payment was received.

16. Defendant SOFIA TROUBETSKAIA, and others known and unknown to the grand jury, failed to send any merchandise to the victims after the victims sent the requested payments.

THE MAILINGS

17. On or about the dates shown below, in the Eastern District of Pennsylvania, and elsewhere, defendant

SOFIA TROUBETSKAIA,

for the purpose of executing the scheme described above, and attempting to do so, and aiding and abetting its execution, knowingly caused to be delivered by mail according to the directions thereon, any matter or thing, that is monetary payment, from the locations shown below to 93 Old York Rd., Suite 1-725, Jenkintown, PA 19046.

Count	Date	Buyer	Amount	From	To
1	5/31/04	K.F	\$1852.00	Toronoto, ON	Jenkintown, PA
2	6/1/04	G.L.	\$1245.00	Bellevue, WA	Jenkintown, PA
3	6/3/04	D.G.	\$1606.00	Frankfort, IL	Jenkintown, PA
4	6/7/04	A.L.	\$1080.00	Mont Clair, NJ	Jenkintown, PA
5	6/9/04	C.D.S	\$3900.00	Seymour, TN	Jenkintown, PA
6	6/14/04	J.C.	\$944.00	Gastonia, NC	Jenkintown, PA

All in violation of Title 18, United States Code, Sections 1341 and 2.

COUNTS SEVEN THROUGH TWELVE

THE GRAND JURY FURTHER CHARGES:

1. Paragraphs 1 through 16 of Count One are incorporated here.

2. On or about the dates shown below, in the Eastern District of

Pennsylvania, and elsewhere, defendant

SOFIA TROUBETSKAIA,

for the purpose of executing the scheme described above, and attempting to do so, and aiding and abetting its execution, knowingly caused to be delivered by commercial interstate carrier according to the directions thereon, any matter or thing, that is monetary payment, from the locations shown below to 93 Old York Rd., Suite 1-725, Jenkintown, PA 19046.

Count	Date	Buyer	Amount	From	To	Carrier
7	5/10/04	K.H.	1955.00	Winter Springs, FL	Jenkintown, PA	Fed Ex
8	5/31/04	S.W.	185.00	Mt. Pleasant, MI	Jenkintown, PA	Fed Ex
9	6/1/04	M.L.	3950.00	Bakersfield, CA	Jenkintown, PA	DHL
10	6/7/04	E.K.	2283.40	Carmel Valley, CA	Jenkintown, PA	Fed Ex
11	6/8/04	K.B.	290.00	Abbotsford, BC	Jenkintown, PA	Fed Ex
12	6/21/04	D.M.	2700.00	Weatogue, CT	Jenkintown, PA	UPS

All in violation of Title 18, United States Code, Sections 1341 and 2.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney